

Gambling Statement of Principles Equalities Impact Assessment (EqIA)

1. Responsibility for the EqIA	
Title of proposal ¹	Gambling Statement of Principles
Name and job title of completing officer	Ash Shah, Group Manager
Head of service area responsible	Jas Lally
Equalities Champion supporting the EqIA	N/A
Performance Management rep	
HR rep (for employment related issues)	N/A
Representative (s) from external stakeholders	

2. Description of proposal

Is this a: (Please tick all that apply)	
New policy /strategy / function / procedure / service	Review of Policy /strategy / function / procedure / service
Budget Saving	Other
If budget saving please specify value below: £139,000	If other please specify below:
Please outline in no more than 3 paragraphs ² :	

The Gambling Act 2005 places a responsibility on all licensing authorities to publish a Gambling Statement of Principles every 3 years. Failure to review the Gambling Statement of Principles would be a breach of the Gambling Act 2005 and would place the Council at risk of challenge.

The adoption of an unsound Statement of Principles may result in a challenge to its lawfulness and the possibility of poor Gambling licence decisions being taken and could cause difficulty to businesses, residents and responsible authorities and could adversely affect the Council's reputation.

3. Supporting evidence

What existing data informs your assessment of the impact of the proposal on protected groups of service users and/or staff? Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis

Protected group	What does the data tell you³?Provide a summary of any relevant demographicdata about the borough's population from the JointStrategic Needs Assessment, or data about thecouncil's workforce	What do people tell you ⁴ ? Provide a summary of relevant consultation and engagement including surveys and other research with stakeholders, newspaper articles correspondence etc.
Age⁵	No identified differential based on age	No feedback received from consultation
Disability ⁶	No identified differential impact based on disability	No feedback received from consultation
Gender reassignment ⁷	No identified differential impact based on Gender reassignment	No feedback received from consultation
Marriage and Civil Partnership ⁸	No identified differential impact based on Marriage.	No feedback received from consultation
Pregnancy and Maternity ⁹	No identified differential impact based on pregnancy and Maternity.	No feedback received from consultation
Race/ Ethnicity ¹⁰	No identified differential impact based on race/ethnicity	No feedback received from consultation
Religion or belief ¹¹	No identified differential impact based on religion or belief	No feedback received from consultation
Sex ¹²	No identified differential impact based on sex	No feedback received from consultation
Sexual Orientation ¹³	No identified differential impact based on sexual orientation	No feedback received from consultation
Other relevant groups ¹⁴	No identified differential impact based on other relevant groups	No feedback received from consultation

4. Assessing What does the eviden	impact ce tell you about the impact your proposal may have on groups with protected characteristics ¹⁵ ?				
Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Is there an impact on service deliver? Is there an impact on		Neg	st	
	customer satisfaction? Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Minor	Major	No impact
Age	 There will be a projected 85,514 children (0-15) living in Barnet in 2024. This is a represents 20.7% of the total population and is higher than the projected 17.8% UK average for the same year. The number of 0-15yr olds is expected to fall slightly over the next 25 years. The 2021 Census estimates the population of Barnet to be 389,300 which is a 9.2% increase on the 2011 Census. The summary key points are: The population in Barnet has grown by 9% between 2011 Census and 2021 Census, this is lower growth than predictions from 2020 Mid-Year estimates. Barnet remains the second largest Borough in London, the same ranking as in the 2011 Census. Of 389,300 people in Barnet, 48.4% were males and 51.6% were females. The population growth was largest in those over 75 years of age. Age group 0-19 has increased by 6.8% against predicted 12.9% increase in 2020 Mid-Year estimates. Census 2021 (sharepoint.com) Statistics for the Gambling Commission contained within the "Gambling Participation in 2019" paper show overall, the highest participation rates in any form of gambling activity were among adults aged between 35 and 54 (between 50% and 53%), while the lowest rates were found among the youngest and oldest age groups; 40% of 16 to 24-year-olds and 42% of those aged 65 and over had gambled in the past year. How many people gamble (gamblingcommission.gov.uk) Actions and objectives are stated in the Statement of Principles that will help protect vulnerable and young people and it is proposed to consult community leads within the Borough on the revised Gambling Licensing Statement of Principles. It is not however anticipated that the proposed policy will have a negative effect on the grounds of age. 				

Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Is there an impact on service deliver? Is there an impact on		Nega imp		act
	customer satisfaction? Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Minor	Major	No impact
Disability	 According to 2021 Census data, 49,679 Barnet residents are classified as disabled under the Equality Act, this means people whose day-to-day activities are limited a lot or a little by a disability or long term medical condition. <u>Census 2021 (sharepoint.com)</u> In the policy applicants are requested to have regard to the type of people that are likely to visit their premises in their application when identifying the steps they will take to promote the licensing objectives. Applicants will be expected to propose steps to ensure that the physical layout of the premises does not present any risks to 'vulnerable' people, some of whom may be disabled. During inspections, officers will refer any relevant details to planning if it is suspected there may be accessibility issues or a lack of planning permission. It is not however anticipated that the proposed policy will have a negative effect on the grounds of disability 				
Gender reassignment	According to 2021 Census data, 2,550 Barnet residents identify with a sex different to their sex registered at birth. <u>Census 2021 (sharepoint.com)</u> The revised Statement of Principles would have a neutral impact on the protected characteristic of Gender reassignment				
Marriage and Civil Partnership	According to 2021 Census data there are 152,805 Barnet residents who are married or in a civil partnership. This figure equates to 49.4% of Barnet's residents which is higher than the 42.3% London average. Insight and Intelligence Hub - Census-2021-Household-and-Legal-Partnership-Briefing-v4.pdf - All Documents (sharepoint.com)				

Protected characteristic	characteristic impact of your proposal (if any). Is there an impact on service deliver? Is there an impact on		Nega imp	act	
	customer satisfaction? Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Minor	Major	No impact
	The revised Statement of Principles would have a neutral impact on the protected characteristic of Marriage and Civil Partnership.				
	The population in Barnet has grown by 9% between the 2011 Census and the 2021 Census, this is lower growth than predictions from the 2020 mid-year population estimates.				
Pregnancy and	2023-03-31_Census_Summary_V3_FINAL.pptx (sharepoint.com)				\boxtimes
Maternity	It is not however anticipated that the proposed policy will have a negative effect on the grounds of pregnancy and maternity/paternity.				
Race/	Barnet's population comprised of 57.7% from a white background, 19.3% from an Asian background, 7.9% from a black background, 5.4% from a mixed background and 9.8% from other ethnic groups in the 2021 Census.				\boxtimes
Ethnicity	Those that reside in Barnet and identified as white British made up 36.2% of the population and reduced by 21,340 vs the 2011 Census (45.5%).				
	Those that identified as "Other ethnic group: Any other ethnic group" increased by 153.5%				

4. Assessing impact What does the evidence tell you about the impact your proposal may have on groups with protected characteristics ¹⁵? For each protected characteristic, explain in detail what the evidence is suggesting and the Protected Negative impact of your proposal (if any). Is there an impact on service deliver? Is there an impact on impact Vo impact characteristic Positive impact customer satisfaction? Click the appropriate box on the right to indicate the outcome of your analysis. Minor Major from 2011 (12,105 (2011) vs 30,687 (2021). **Population by Ethnicity** 250.000 200.000 150.000 100,000 50,000 other ethr Insight and Intelligence Hub - Census-2021---Ethnicty--Religion---Lanaguage-Briefing-v2.pdf - All Documents (sharepoint.com) Some considerable differences were evident in the Annual Statistics form the national Gambling Treatment Service – England between the gambling locations reported by different ethnic groups. Compared to White or White British gamblers, those who identified as Black or Black British were more likely to use bookmakers (46% compared to 28%) or casinos (17% compared to 5%). Those who identified as Asian or Asian British were also more likely than White or White British gamblers to use bookmakers (32%) or casinos (15%). Overall, those who identified as Black or Black British were the most likely to use bookmakers and the least likely to use online services (63%). https://www.begambleaware.org/sites/default/files/2021-11/FINAL GA Annual%20stats report 2020-21 English.pdf

Protected characteristic	impact of your proposal (For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Is there an impact on service deliver? Is there an impact on								ative bact	act			
	customer satisfaction? Click the appropriate box	on the	right to	indicat	te the c	outcom	e of yoı	ır analy	/sis.		Positive impact	Minor	Major	No impact
		White	or White British	Black	or Black British	Asian	or Asian British		Mixed					
		N	%	N	%	N	%	N	%					
	Bookmakers	1452	28.0%	109	46.2%	103	32.0%	26	22.8%					
	Bingo Hall	68	1.3%	7	3.0%	0	0.0%	0	0.0%					
	Casino	272	5.2%	41	17.4%	47	14.6%	14	12.3%					
	Live Events	23	0.4%	3	1.3%	0	0.0%	0	0.0%					
	Adult Entertainment Centre	134	2.6%	5	2.1%	5	1.6%	3	2.6%	_				
	Family Entertainment Centre	34	0.7%	1	0.4%	0	0.0%	1	0.9%					
	Pub	121	2.3%	2	0.8%	1	0.3%	0	0.0%					
	Online	4143	80.0%	148	62.7%	242	75.2%	103	90.4%	_				
	Miscellaneous	421	8.1%	17	7.2%	20	6.2%	9	7.9%	_				
	Private Members Club	7	0.1%	0	0.0%	1	0.3%	1	0.9%					
	Other	48	0.9%	6	2.5%	4	1.2%	1	0.9%					
	Total gamblers* *Categories of ethnic group with less Note: %s may total > 100% as more th Consultation on the new consultees, including rep that the proposed policy	an one loco Stateme resentat	ent of L tives fro	e reported icensin om the	g Princi busines	ples wi	munity.	lt is no						
ligion or belief	2011 census data shows had the largest increase i population identifying as coincides with the decrea "Christian".	n Barne having '	t from ("no reli	Census gion" w	2011 to vhich is	o Censi an inci	us 2021 rease of	with 20 4.1% f	0.2% o rom 2(of Barnet's 011. This				D

Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Is there an impact on service deliver? Is there an impact on		Nega	act	
	customer satisfaction? Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Minor	Major	No impact
	In Census 2021, 47,688 residents described themselves as "Muslim" which is a 30% increase from Census 2011 where 36,744 residents described themselves as "Muslim" which is the highest increase in number for those identifying as having a religion from the previous census.				
	Barnet 2021 vs London 2021 EthnicitySamet 2021 barnet vs London Population Percent by EthnicityThe Local Authority has established procedures for engaging with the diverse range of businesseswithin the borough.Consultation on the new Statement of Licensing Policy will be undertaken with statutory				
	consultees, including representatives from the business community. It is not however anticipated that the proposed policy will have a negative effect on the grounds of race.				

4. Assessing What does the evider	g impact nce tell you about the impact	your proposal m	nay have on g	roups with pro	otected chara	acteristics ¹⁵ ?				
Protected characteristic	For each protected charactimpact of your proposal (if	a)	Neg im	act						
	customer satisfaction? Click the appropriate box o	on the right to in	dicate the out	come of your a	analysis.		Positive impact	Minor	Major	No impact
	Statistics shown in the Be (male gamblers, females we compared to 7%) or pubs (more likely to use bingo ha to 2%), family entertainment cent to 7%).	ere less likely to 1% compared to alls (6% compare	use bookmak 2%) or online d to <1%), ad	ers (10% comp e services (78% lult entertainm	ared to 34%) compared t ent centres), casinos (4% o 83%) but (4% compared				
	Bookmakers	1607	33.5%	Number 115	76 10.4%					
	Bingo Hall	15	0.3%	61	5.5%					
	Casino	344	7.2%	42	3.8%					
	Live Events	26	0.5%	1	0.1%					
Corr	Adult Entertainment Centre	99	2.1%	47	4.2%					
Sex	Family Entertainment Centre	23	0.5%	13	1.2%					
	Pub	108	2.3%	16	1.4%					
	Online	3737	77.9%	924	83.4%					
	Miscellaneous	336	7.0%	132	11.9%					
	Private Members Club	6	0.1%	1	0.1%					
	Other	50	1.0%	7	0.6%					
	Total gamblers*	4798		1108						
	*Categories of gender with less than 100 Note: %s may total > 100% as more than https://www.begambleaw 11/FINAL GA Annual%20s The revised Statement of F of Sex (gender).	one location can be rep are.org/sites/de stats_report_202	orted fault/files/202 20-21_English	.pdf	e protected o	characteristic				

Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Is there an impact on service deliver? Is there an impact on			ative bact	act
	customer satisfaction? Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Minor	Major	No impact
	About 90% of residents aged 16 years and over in Barnet answered the question relating to their sexual orientation in the 2021 Census.				
	A total of 270,000 residents (87.3%) in Barnet identified themselves as straight or heterosexual.				
	A total of 8,633 residents (2.8%) identified with an LGB+ orientation ("Gay or Lesbian", "Bisexual" or				
	"Other sexual orientation" as categorised by the Office of National Statistics). This was below both the London average (4.3%) and the England average (3.2%).				
	 3,864 residents (1.3%) described themselves as gay or lesbian. 				
	 3,286 residents (1.1%) described themselves as bisexual. 				
Sexual Orientation	 1,483 residents (0.5%) selected "other sexual orientation". 				\boxtimes
	The residents who chose "other sexual orientation" wrote in responses, including pansexual (n=1,125, 0.4%), asexual (n=144, 0.1%), queer (n=99, 0.03%), and all other sexual orientations (n=115, 0.04%).				
	The remaining 30,000 Barnet residents aged 16 years and over (9.9%) did not answer the question on sexual orientation, which was similar to the London average (9.5%) but higher than the England average (7.5%).				
	Insight and Intelligence Hub - Census-2021Gender-and-Sexual-Orientation-Briefing-v3.pdf - All Documents (sharepoint.com)				
	The revised Statement of Principles would have a neutral impact on the protected characteristic of Sexual Orientation				

5. Other key groups	Pos itiv e imn	Negative impact	imp act
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	r vulnerable groups that might be affected by the proposal? c carers, people in receipt of care, lone parents, people with low incomes or	Minor	Major	
Key groups	NA			\boxtimes

6. Cumulative impact¹⁶

Considering what else is happening within the council and Barnet could your proposal contribute to a cumulative impact on groups with protected characteristics?

Yes No 🛛

If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below

7. Actions to mitigate or remove negative impact

Only complete this section if your proposals may have a negative impact on groups with protected characteristics. These need to be included in the relevant service plan for mainstreaming and performance management purposes.

Group affected	Potential negative impact	Mitigation measures ¹⁷ If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	Monitoring ¹⁸ How will you assess whether these measures are successfully mitigating the impact?	Deadline date	Lead Officer
No gap identified with regards to equalities and diversity and the Statement of Gambling Principles	None	Will ensure premises are considering their own impact on vulnerable persons such as persons with disabilities or with gambling addictions.	Continued engagement with the trade to ensure local area risk assessments are undertaken and these are suitable. Equality monitoring forms will be distributed in these instances	26/10/2023	Ash Shah

under the Gambling			
Act 2005			

8. Outcome of the Equalities Impact Assessment (EqIA)¹⁹

Please select one of the following four outcomes

Proceed with no changes

The EqIA has not identified any potential for a disproportionate impact and all opportunities to advance equality of opportunity are being addressed

Proceed with adjustments

Adjustments are required to remove/mitigate negative impacts identified by the assessment

Negative impact but proceed anyway

This EqIA has identified negative impacts that are not possible to mitigate. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below

Do not proceed

This EqIA has identified negative impacts that cannot be mitigated and it is not possible to continue. Outline the reasons for this and the information used to reach this decision in the space below

Reasons for decision

The Gambling Statement of Principles sets out the framework against which the London Borough of Barnet will carry out its functions under the Gambling Act 2005. There is a statutory requirement for the Council to produce a Gambling Statement of Principles. The Statement of Principles has been developed to ensure it complies with the requirements under the Gambling Act. Full regard has also been given to the Statutory Guidance issued by the Gambling Commission.

The Policy must only promote the 3 gambling licensing objectives which are:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
- ensuring that gambling is conducted in a fair and open way
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

The decision making process is subject to primary equalities legislation to ensure transparent and fair decision making.

All of the above will take priority over any part of the local Gambling Statement of Principles.

Sign-off

9.Sign off and approval by Head of Service / Strategic lead ²⁰							
Name: Jas Lally	Job title						
Tick this box to indicate that you have approved this EqIA	Date of approval:						
Tick this box to indicate if EqIA has been published Date EqIA was published: Embed link to published EqIA:	Date of next review:						

Footnotes: guidance for completing the EqIA template

¹ Title of EqIA: This should clearly explain what service / policy / strategy / change you are assessing.

² Focus of EqIA: A member of the public should have a good understanding of the proposals being assessed by the EqIA after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Assessment (EqIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the proposed change?
- Who implements, carries out or delivers the service or function in the proposal? Please state where this is more than one person or group, and where other organisations deliver it under procurement or partnership arrangements.
- How does it fit with other services?
- Who is affected by the service, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? E.g.: what do you want to provide, what changes or improvements, and what should the benefits be?
- What do existing or previous inspections of the service tell you?
- What is the reason <u>for</u> the proposed change (financial, service, legal etc)? The Act requires us to make these clear.

³ Data & Information: Your EqIA needs to be informed by data. You should consider the following:

- What data is relevant to the impact on protected groups is available? (is there an existing EqIA?, local service data, national data, community data, similar proposal in another local authority).
- What further evidence is needed and how can you get it? (e.g. further research or engagement with the affected groups).
- What do you know from service/local data about needs, access and outcomes? Focus on each characteristic in turn.
- What might any local demographic changes or trends mean for the service or function? Also consider national data if appropriate.
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any group(s)?
- Is the service having a positive or negative effect on particular people or groups in the community?

⁴ What have people told you about the service, function, area?

- Use service user feedback, complaints, audits
- Conduct specific consultation or engagement and use the results
- Are there patterns or differences in what people from different groups tell you?
- Remember, you must consult appropriately and in an inclusive way with those likely to be affected to fulfil the equality duty.
- You can read LBB<u>Consultation and Engagement toolkit</u> for full advice or contact the Consultation and Research Manager, <u>rosie.evangelou@barnet.gov.uk</u> for further advise

⁵ Age: People of all ages, but consider in particular children and young people, older people and carers, looked after children and young people leaving care. Also consider working age people.

⁶ **Disability**: When looking at disability, consideration should be given to people with different types of impairments: physical (including mobility), learning, aural or sensory (including hearing and vision impairment), visible and non-visible impairment. Consideration should also be given to: people with HIV, people with mental

health needs and people with drug and alcohol problems. People with conditions such as diabetes and cancer and some other health conditions also have protection under the Equality Act 2010.

⁷ **Gender Reassignment:** In the Act, a transgender person is someone who proposes to, starts or has completed a process to change their gender. A person does not need to be under medical supervision to be protected. Consider transgender people, transsexual people and transvestites.

⁸ Marriage and Civil Partnership: consider married people and civil partners.

⁹ **Pregnancy and Maternity:** When looking at pregnancy and maternity, give consideration to pregnant women, breastfeeding mothers, part-time workers, women with caring responsibilities, women who are lone parents and parents on low incomes, women on maternity leave and 'keeping in touch' days.

¹⁰ **Race/Ethnicity:** Apart from the common ethnic groups, consideration should also be given to Traveller communities, people of other nationalities outside Britain who reside here, refugees and asylum seekers and speakers of other languages.

¹¹ **Religion and Belief:** Religion includes any religion with a clear structure and belief system. As a minimum you should consider the most common religious groups (Christian, Muslim, Hindu, Jews, Sikh, Buddhist) and people with no religion or philosophical beliefs.

¹² **Sex/Gender:** Consider girls and women, boys and men, married people, civil partners, part-time workers, carers (both of children with disabilities and older cares), parents (mothers and fathers), in particular lone parents and parents on low incomes.

¹³ Sexual Orientation: The Act protects bisexual, heterosexual, gay and lesbian people.

¹⁴ **Other relevant groups:** You should consider the impact on our service users in other related areas.

¹⁵ **Impact:** Your EqIA must consider fully and properly actual and potential impacts against each protected characteristic:

- The equality duty does not stop changes, but means we must fully consider and address the anticipated impacts on people.
- Be accurate and transparent, but also realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific where you can so decision-makers have a concrete sense of potential effects.
- Questions to ask when assessing whether and how the proposals impact on service users, staff and the wider community:
- Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
- Is there evidence of higher/lower uptake of a service among different groups? Which, and to what extent?
- Does the project relate to an area with known inequalities (where national evidence or previous research is available)?
- If there are likely to be different impacts on different groups, is that consistent with the overall objective?
- If there is negative differential impact, how can you minimise that while taking into account your overall aims?
- Do the effects amount to unlawful discrimination? If so the plan **must** be modified.
- Does it relate to an area where equality objectives have been set by LBB in our <u>Barnet 2024 Plan</u> and our <u>Strategic Equality Objective</u>?

¹⁶ Cumulative Impact

You will need to look at whether a single decision or series of decisions might have a greater negative impact on a specific group and at ways in which negative impacts across the council might be minimised or avoided.

¹⁷ Mitigating actions

- Consider mitigating actions that specifically address the impacts you've identified and show how they will remove, reduce or avoid any negative impacts
- Explain clearly what any mitigating measures are, and the extent to which you think they will reduce or remove the adverse effect
- Will you need to communicate or provide services in different ways for different groups in order to create a 'level playing field'?
- State how you can maximise any positive impacts or advance equality of opportunity.
- If you do not have sufficient equality information, state how you can fill the gaps.

¹⁸ **Monitoring:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further monitoring, equality assessment, and consultation are needed.

¹⁹ Outcome:

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Also explain what positive impacts will result from the actions and how you can make the most of these.
- Make it clear if a change is needed to the proposal itself. Is further engagement, research or monitoring needed?
- Make it clear if, as a result of the analysis, the policy/proposal should be stopped.

²⁰ **Sign off:** Your will need to ensure the EqIA is signed off by your Head of Service, agree whether the EqIA will be published, and agree when the next review date for the EqIA will be.